

REMARKS**Claim Changes**

Claims 1, 16, 20, and 23 are amended to clarify and simplify the language and to correct a typographical error as suggested in the Office Action.

No amendment made is related to the statutory requirements of patentability unless expressly stated herein. No amendment is made for the purpose of narrowing the scope of any claim, unless Applicant had argued herein that such amendment is made to distinguish over a particular reference or combination of references. Any remarks made herein with respect to a given claim or amendment is intended only in the context of that specific claim or amendment, and should not be applied to other claims, amendments, or aspects of Applicant's invention.

Rejection of claims 1-8, 16 and 20-24 under 35 U.S.C. § 112, second paragraph

Claims 1, 16, 20, and 23 have been amended to remedy the rejections under 35 U.S.C. §112, second paragraph. Applicant submits that claims 1-8, 16 and 20-24, as amended, overcome the rejections of the claims under 35 U.S.C. §112, second paragraph, and respectfully requests that the rejections be withdrawn.

Rejection of claims 1-6, and 9-16 under 35 U.S.C. § 103(a) as being unpatentable over US 4,760,570 (Acampora) in view of US 5,475,679 (Munter)

Applicant respectfully traverses in part and amends in part. Applicant has amended the claims to clarify the invention. Applicant therefore respectfully requests reconsideration of the rejection of claims 1-6, and 9-16 under 35 U.S.C. § 103(a) as being unpatentable over Acampora in view of Munter.

The Office Action on page 5, item 9 states “Acampora et al. does not disclose the controller is uncoupled from the data link.” In the Office Action, it is acknowledged that Acampora does not disclose this but that “Munter teaches a controller uncoupled from a data link for controlling selection of destination output for data transmitted via the data link (e.g. see Fig. 5, Core controller 80; column 6, lines 3-13).”

Applicant respectfully submits that neither Acampora nor the combination of Acampora and Munter teaches or suggests all the claim limitations as set forth in independent claim 1. Specifically, claim 1 recites “broadcasting, by the source module, the data *to each destination module of a plurality of destination modules*, and receiving, by *each destination module of the plurality of destination modules*, the data...selecting, by a controller uncoupled from the data link, a destination module of the plurality of destination modules...wherein the destination module is selected without employing the data link,” and “identifying, by the controller to the selected destination module, the inbound time slot... and processing, by only the selected destination module, the broadcast data based on the identified time slot,” which are not taught or suggested in the Acampora or the combination of Acampora and Munter.

Munter discloses an ATM switch that includes N input buffer modules, N output buffer modules, and an N port space switch core. The space switch core connects the input and output buffer modules under the control of a core controller positioned in the space switch core. The core controller is used to avoid collision at the space switch core outputs. The controller receives a connection request from the input buffer modules and sets up crosspoint connections in the space switch core and sends a connection grant back to the input buffer modules. See col. 4, lines 55-65 of Munter.

It appears that the Office Action equates Applicant's “controller” with Munter's “core controller.” Munter's core controller is basically used to avoid collision at the space switch core outputs. The core controller receives status information (a connection request) from the input buffer modules (equated to Applicant's source modules). The received status information indicates to the core controller that a connection is requested to the output port. Thus, it is clear that the output port is selected by the input buffer module, and not by the core controller. For example, the core controller merely sets up crosspoint connection with the output buffer module based on the status information, indicating the output buffer module, received from the input buffer module. See col. 4, lines 55-65 of Munter. In contrast, Applicant's claim recites “electing, by a controller uncoupled from the data link, a destination module of the plurality of destination modules.”

Additionally, Munter's core controller simply connects, that is, sets up crosspoint connection between, the input and output buffer modules, and further makes no mention of informing the output buffer module of the inbound time slot at which the broadcast data is received. In contrast, Applicant's claim recites broadcasting, by the source module, the data to each destination module of the multiple destination modules and receiving, by each of the destination modules, the data, identifying, by the controller to the selected destination module, the inbound time...and processing, by the only selected destination module, the broadcast data based on the identified inbound time slot."

The Office Action, in page 4, item 9, lines 5-7, states that "Acampora et al. discloses....broadcasting the data to each destination module via a data link associated with the destination module and an inbound time slot of a plurality of inbound time slots (data are broadcasted on channels 14₁-14_N, via TIME SLOT)." It appears that the Office Action equates Applicant's "broadcasting...the data" with Acampora's broadcasting the packets. Acampora discloses an N-by-N packet switch that includes a bus interface unit 15_i associated with each output 12_i of the N-by-N packet switch. Each bus interface unit includes a packet filter 20_i that examines every packet broadcast on the associated broadcast bus 14_i and *allows only those packets that are addressed to the associated output of switch 11 and blocks all other packets* from the output. See col. 4, lines 45-50, of Acampora. Thus, Acampora interposes a filter between each output (equated to Applicant's destination modules) and the bus. In contrast, Applicant's claim recites a simpler, less expensive system that does not include such filters. That is, Applicant's claim recites "receiving, *by each destination module of the plurality of destination modules*, the data" and then "processing, *by only the selected destination module*, the broadcast data."

Therefore, the combination of Acampora and Munter does not teach or suggest the above mentioned claim limitations as recited in independent claim 1, so the Applicant respectfully requests withdrawal of the rejection of claim 1 under 35 U.S.C 103(a).

Regarding independent claim 9, Applicant respectfully submits that the above discussed arguments apply equally to the limitations of claim 9. Applicant therefore respectfully requests withdrawal of the rejection of claim 9 under 35 U.S.C 103(a).

Dependent claims 2-6, and 10-16 depend from, and include all the limitations of independent claims 1 and 9. Therefore, Applicant respectfully requests reconsideration of dependent claims 2-6, and 10-16 and requests the withdrawal of the rejection.

Rejection of claims 7, 8, and 17-22 under 35 U.S.C. § 103(a) as being unpatentable over US 4,760,570 (Acampora), in view of US 5,475,679 (Munter), and in view of US 4,392,222 (Ando)

In paragraph 10 of the Office Action, the Examiner contended that Ando teaches a selected destination module that applies a tag to produce tagged data and conveys the tagged data in a time slot to the source module (column 4, lines 41-56). Claim 20 has been amended to provide that the tag applied by the destination module “is not an address and indicates that the data included in the time slot is to be forwarded by the source module.” These features are not taught by Ando.

Ando merely teaches adding an address to an acknowledgement. And the added address is merely that of the terminal for which the acknowledgement is intended. Claim 20, as amended, expressly provides that the tag is not an address and, unlike Ando, the tag is not intended to identify the source module to which the data is being routed. Instead, the tag is an indicator to the source module to forward the data included in the time slot and, as a result and as noted in the Applicant’s specification, can be as short as a single bit. Such a tag is not taught by Ando. Therefore, Ando does not teach, and neither does Acampora or Munter, the feature of claim 20 of a tag applied by the destination module that “is not an address and indicates that the data included in the time slot is to be forwarded by the source module.” Accordingly, the Applicant requests reconsideration and withdrawal of the rejection of claim 20 under 35 U.S.C. §103(a) over Acampora, Munter, and Ando.

Dependent claims 7 and 8 depend from, and include all the limitations of, independent claim 1, dependent claims 17-19 depend from, and include all the limitations of, independent claim 9, and dependent claims 21-22 depend from, and include all the limitations of, independent claim 20. Therefore, Applicant respectfully requests reconsideration of dependent claims 7, 8, 17-19, and 21-22, and requests the withdrawal of the rejection.

Rejection of claims 23 and 24 under 35 U.S.C. § 103(a) as being unpatentable over US 4,392,222 (Ando) in view of US 4,760,570 (Acampora)

Similar to claim 20, claim 23 has been amended to provide for applying a tag to the data to produce tagged data, *wherein the tag is not an address and indicates that the data included in the time slot is to be forwarded by the source module*, embedding, by the selected destination module, the tagged data in the allocated time slot, and transferring the tagged data to the source module in the allocated time slot. As discussed above, these features are not taught by Ando or Acampora, individually or in combination. Therefore, the Applicant requests reconsideration and withdrawal of the rejection of claim 23 under 35 U.S.C. § 103(a) over Ando in view of Acampora.

Dependent claim 24 depends from, and includes all the limitations of, independent claim 23. Therefore, the Applicant respectfully requests reconsideration of dependent claim 24 and requests the withdrawal of the rejection.

Conclusion

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Such action is earnestly solicited by the Applicant. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact Applicant's attorney at the telephone number indicated below.

Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,

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